

Title V Annual Compliance Certification
Zeon Chemicals, L.P. (ID #0283)
Attachment A

1. SECTION C – COMPLIANCE STATUS

S1.a.i.(1-2): For storage vessels regulated under LMAPCD Regulation 6.13 or 7.12, the Operator shall comply with the Regulation by having a permanent submerged fill pipe.

<u>Emission Unit ID</u>	<u>Stack ID</u>	<u>Compliance</u>
E-TKF-TK-101	S-TKF-TK-101	Continuous Compliance for all Emission Points
E-TKF-TK-102	S-TKF-TK-102	
E-TKF-TK-103	S-TKF-TK-103	
E-TKF-TK-104	S-TKF-TK-104	
E-TKF-TK-105	S-TKF-TK-105	
E-TKF-TK-106	S-TKF-TK-106	
E-TKF-TK-107	S-TKF-TK-107	
E-TKF-TK-108	S-TKF-TK-108	
E-TKF-TK-109A	S-TKF-TK-109A	
E-TKF-TK-401	S-TKF-TK-401	
E-TKF-TK-402	S-TKF-TK-402	
E-TKF-TK-404	S-TKF-TK-404	
E-TKF-TK-405	S-TKF-TK-405	
E-TKF-TK-406	S-TKF-TK-406	
E-TKF-TK-407	S-TKF-TK-407	
E-TKF-TK-409	S-TKF-TK-409	
E-TKF-TK-410	S-TKF-TK-410	
E-PLY-TK-307N	S-PLY-TK-307N	
E-PLY-TK-304	S-PLY-TK-304	
E-PLY-TK-305	S-PLY-TK-305	
E-PLY-TK-306	S-PLY-TK-306	
E-DRY-CAGTK-106	S-DRY-CAGTK-106	

Or, if not equipped with a permanent submerged/bottom fill, store volatile organic compounds with a vapor pressure less than 1.5psia.

<u>Emission Unit ID</u>	<u>Stack ID</u>	<u>Compliance</u>
E-TKF-TK-403	S-TKF-TK-403	Continuous compliance for all Emission Points
E-TKF-TK-408	S-TKF-TK-408	
E-TKF-TK-411	S-TKF-TK-411	
E-TKF-TK-412	S-TKF-TK-412	
E-PLY-TK-150	S-PLY-TK-150	
E-PLY-TK-152	S-PLY-TK-152	
E-PLY-MRSSTK	S-PLY-MRS-TO	

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S1.a.i.(1-2): Tanks listed as having permanent bottom fill are being maintained as such. Tanks limited to storing VOC's with a vapor pressure less than 1.5 psia have stored only such materials during the reporting period. Records of materials being stored are maintained on site. Compliance is continuous.

2. SECTION C – COMPLIANCE STATUS

S1.a. ii.: For emission points cited in U-ZN subject to LMAPCD Regulation 6.24, the operator shall achieve a minimum overall 85% VOC reduction averaged over a calendar month by not exceeding average monthly post-stripping residual monomer levels of 6,870 ppm acrylonitrile and 810 ppm butadiene.

<u>Emission Unit ID</u>	<u>Stack ID</u>	<u>Compliance</u>
E-TKF-100RCU	S-TKF-100CFU	Continuous Compliance for all Emission Points
E-TKF-100TU	S-TKF-100CFU	
E-TKF-400U	F2	
E-PLY-SPT-1	“	
E-PLY-SPT-2	“	
E-PLY-SPT-3	“	
E-PLY-SPT-4	“	
E-PLY-SPT-5	“	
E-PLY-SPT-6	“	
E-PLY-SPT-7	“	
E-PLY-SPT-8	“	
E-PLY-TK-26	“	
E-PLY-MTK-101	“	
E-PLY-MTK-102	“	
E-PLY-TK-113	“	
E-PLY-PLY-1	S-PLY-PVJ or S-PLY-MRS	
E-PLY-PLY-2	S-PLY-PVJ or S-PLY-MRS	
E-PLY-PLY-3	S-PLY-PVJ or S-PLY-MRS	
E-PLY-PLY-4	S-PLY-PVJ or S-PLY-MRS	
E-PLY-PLY-5	S-PLY-PVJ or S-PLY-MRS	
E-PLY-PLY-6	S-PLY-PVJ or S-PLY-MRS	
E-PLY-PLY-7	S-PLY-PVJ or S-PLY-MRS	
E-PLY-PLY-8	S-PLY-PVJ or S-PLY-MRS	
E-PLY-PLY-9	S-PLY-PVJ or S-PLY-MRS	
E-PLY-PLY-10	S-PLY-PVJ or S-PLY-MRS	
E-PLY-PLY-11	S-PLY-PVJ or S-PLY-MRS	
E-PLY-PLY-12	S-PLY-PVJ or S-PLY-MRS	
E-PLY-PLY-13	S-PLY-PVJ or S-PLY-MRS	
E-PLY-PLY-14	S-PLY-PVJ or S-PLY-MRS	

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E-PLY-PLY-15	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-16	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-17	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-18	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-19	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-20	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-21	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-22	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-23	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-24	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-25	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-26	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-27	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-28	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-29	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-30	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-31	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-32	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-33	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-34	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-35	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-36	S-PLY-PVJ or S-PLY-MRS
E-PLY-BDTTK-1	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-2	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-3	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-4	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-5	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-6	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-7	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-8	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-9	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-10	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-11	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-12	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-14	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-15	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-16	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-17	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-18	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-TK-101	S-PLY-TCO
E-PLY-TK-102	S-PLY-TCO
E-PLY-CN101/2/VJ	S-PLY-TCO
E-PLY-BLTTK-13	S-PLY-BLTTK-13/14/15/16
E-PLY-BLTTK-14	S-PLY-BLTTK-13/14/15/16
E-PLY-BLTTK-15	S-PLY-BLTTK-13/14/15/16

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E-PLY-BLTTK-16	S-PLY-BLTTK-13/14/15/16
E-PLY-BLTTK-17	S-PLY-BLTTK-17/18/19/20
E-PLY-BLTTK-18	S-PLY-BLTTK-17/18/19/20
E-PLY-BLTTK-19	S-PLY-BLTTK-17/18/19/20
E-PLY-BLTTK-20	S-PLY-BLTTK-17/18/19/20
E-PLY-BLTTK-21	S-PLY-BLTTK-21/22/23/24
E-PLY-BLTTK-22	S-PLY-BLTTK-21/22/23/24
E-PLY-BLTTK-23	S-PLY-BLTTK-21/22/23/24
E-PLY-BLTTK-24	S-PLY-BLTTK-21/22/23/24
E-PLY-BLTTK-25	S-PLY-BLTTK-25/26
E-PLY-BLTTK-26	S-PLY-BLTTK-25/26
E-PLY-BLTTK-27	S-PLY-BLTTK-27/28/29/30
E-PLY-BLTTK-28	S-PLY-BLTTK-27/28/29/30
E-PLY-BLTTK-29	S-PLY-BLTTK-27/28/29/30
E-PLY-BLTTK-30	S-PLY-BLTTK-27/28/29/30
E-PLY-BLTTK-31	S-PLY-BLTTK-31/32/33/34
E-PLY-BLTTK-32	S-PLY-BLTTK-31/32/33/34
E-PLY-BLTTK-33	S-PLY-BLTTK-31/32/33/34
E-PLY-BLTTK-34	S-PLY-BLTTK-31/32/33/34
E-PLY-BLTTK-35	S-PLY-BLTTK-35/36/37
E-PLY-BLTTK-36	S-PLY-BLTTK-35/36/37
E-PLY-BLTTK-37	S-PLY-BLTTK-35/36/37
E-PLY-BLTTK-38	S-PLY-BLTTK-38/39
E-PLY-BLTTK-39	S-PLY-BLTTK-38/39
E-PLY-S/WTk-HL-65	F2
E-PLY-MUTK-HL-191A	F2
E-PCO-TK-4	S-PCO-TK-4/5/7/8/9
E-PCO-TK-5	S-PCO-TK-4/5/7/8/9
E-PCO-TK-7	S-PCO-TK-4/5/7/8/9
E-PCO-TK-8	S-PCO-TK-4/5/7/8/9
E-PCO-TK-9	S-PCO-TK-4/5/7/8/9
E-PCO-TK-11	Included with E-PCO-CN-1
E-PCO-CN-1	S-PCO-VJT
E-SDR-NBLT	S-SDR-N/SBLT
E-SDR-SBLT	S-SDR-N/SBLT
E-SDR-1BLT	S-SDR-1BLT
E-SDR-2BLT	S-SDR-2BLT
E-SDR-EBLT	S-SDR-EBLT
E-SDR-WBLT	S-SDR-WBLT
E-SDR-1SD	S-SDR-1SD
E-SDR-2SD	S-SDR-2SD
E-SDR-2SDCYC	S-SDR-2SD
E-DRY-FTK-202	F2
E-DRY-FTK-203	F2
E-DRY-FTK-204	F2

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E-DRY-NTK-15H	S-DRY-NC/W
E-DRY-NSCR-1	S-DRY-NC/W
E-DRY-NTK-16H	S-DRY-NC/W
E-DRY-NTK-17H	S-DRY-NC/W
E-DRY-NTK-18H	S-DRY-NC/W
E-DRY-NPRS-1	S-DRY-NPRS/NDR1
E-DRY-NGR-1H	S-DRY-NPRS/NDR1
E-DRY-NDR	S-DRY-NPRS/NDR1, S-DRY-NDR2, S-DRY-NDR3
E-DRY-NSCR-2	S-DRY-NC/W

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S1.a. ii.: Compliance is determined by the collection and analysis of daily acrylonitrile and butadiene residual samples from latex run through the Monomer Recovery System as specified in Title V Permit Condition S1.d.vi, the calculation and recording of an average calendar monthly post-stripping residual acrylonitrile and butadiene concentration per Title V Permit Condition S2.a.ii.(1-2), and with exceedances or deviations reported semi-annually per Title V Permit Condition S3.a.ii.. Data from this method would be considered to be continuous. Samples were collected on all operating days, and averages were calculated and recorded for all twelve months of the reporting period. Compliance is continuous.

3. SECTION C – COMPLIANCE STATUS

S1.a.iii.: For emission points subject to Regulation 6.43, the owner or operator shall not exceed the plant wide VOC emissions limit of 4,133 pounds per day.

<u>Emission Unit ID</u>	<u>Stack ID</u>	<u>Compliance</u>
E-TKF-100RCU	S-TKF-100CFU	<i>CONTINUOUS COMPLIANCE FOR ALL EMISSION POINTS</i>
E-TKF-100TU	S-TKF-100CFU	
E-TKF-TK-101	S-TKF-TK-101	
E-TKF-TK-102	S-TKF-TK-102	
E-TKF-TK-103	S-TKF-TK-103	
E-TKF-TK-104	S-TKF-TK-104	
E-TKF-TK-105	S-TKF-TK-105	
E-TKF-TK-106	S-TKF-TK-106	
E-TKF-TK-107	S-TKF-TK-107	
E-TKF-TK-108	S-TKF-TK-108	
E-TKF-TK-109A	S-TKF-TK-109A	
E-TKF-400U	F2	
E-TKF-TK-401	S-TKF-TK-401	
E-TKF-TK-402	S-TKF-TK-402	
E-TKF-TK-403	S-TKF-TK-403	

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E-TKF-TK-404	S-TKF-TK-404
E-TKF-TK-405	S-TKF-TK-405
E-TKF-TK-406	S-TKF-TK-406
E-TKF-TK-407	S-TKF-TK-407
E-TKF-TK-408	S-TKF-TK-408
E-TKF-TK-409	S-TKF-TK-409
E-TKF-TK-410	S-TKF-TK-410
E-TKF-TK-411	S-TKF-TK-411
E-TKF-TK-412	S-TKF-TK-412
E-PLY-MRSSTK	F2
E-PLY-PAMU	F2
E-PLY-TK-304	S-PLY-TK-304
E-PLY-TK-305	S-PLY-TK-305
E-PLY-TK-306	S-PLY-TK-306
E-PLY-TK-150	S-PLY-TK-150
E-PLY-TK-152	S-PLY-TK-152
E-PLY-SPT-1	F2
E-PLY-SPT-2	F2
E-PLY-SPT-3	F2
E-PLY-SPT-4	F2
E-PLY-SPT-5	F2
E-PLY-SPT-6	F2
E-PLY-SPT-7	F2
E-PLY-SPT-8	F2
E-PLY-TK-26	F2
E-PLY-MTK-101	F2
E-PLY-MTK-102	F2
E-PLY-TK-113	F2
E-PLY-PLY-1	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-2	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-3	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-4	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-5	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-6	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-7	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-8	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-9	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-10	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-11	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-12	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-13	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-14	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-15	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-16	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-17	S-PLY-PVJ or S-PLY-MRS

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E-PLY-PLY-18	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-19	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-20	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-21	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-22	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-23	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-24	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-25	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-26	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-27	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-28	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-29	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-30	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-31	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-32	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-33	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-34	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-35	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-36	S-PLY-PVJ or S-PLY-MRS
E-PLY-BDTK-1	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-2	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-3	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-4	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-5	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-6	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-7	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-8	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-9	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-10	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-11	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-12	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-14	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-15	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-16	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-17	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-18	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-TO-113	S-PLY-TO-113
E-PLY-TK-101	S-PLY-TCO
E-PLY-TK-102	S-PLY-TCO
E-PLY-PLY-37	S-PLY-TCO
E-PLY-PLY-38	S-PLY-TCO
E-PLY-CN101/2/VJ	S-PLY-TCO
E-PLY-BLTTK-13	S-PLY-BLTTK-14/14/15/16
E-PLY-BLTTK-14	S-PLY-BLTTK-14/14/15/16
E-PLY-BLTTK-15	S-PLY-BLTTK-14/14/15/16

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E-PLY-BLTTK-16	S-PLY-BLTTK-13/14/15/16
E-PLY-BLTTK-17	S-PLY-BLTTK-17/18/19/20
E-PLY-BLTTK-18	S-PLY-BLTTK-17/18/19/20
E-PLY-BLTTK-19	S-PLY-BLTTK-17/18/19/20
E-PLY-BLTTK-20	S-PLY-BLTTK-17/18/19/20
E-PLY-BLTTK-21	S-PLY-BLTTK-21/22/23/24
E-PLY-BLTTK-22	S-PLY-BLTTK-21/22/23/24
E-PLY-BLTTK-23	S-PLY-BLTTK-21/22/23/24
E-PLY-BLTTK-24	S-PLY-BLTTK-21/22/23/24
E-PLY-BLTTK-25	S-PLY-BLTTK-25/26
E-PLY-BLTTK-26	S-PLY-BLTTK-25/26
E-PLY-BLTTK-27	S-PLY-BLTTK-27/28/29/30
E-PLY-BLTTK-28	S-PLY-BLTTK-27/28/29/30
E-PLY-BLTTK-29	S-PLY-BLTTK-27/28/29/30
E-PLY-BLTTK-30	S-PLY-BLTTK-27/28/29/30
E-PLY-BLTTK-31	S-PLY-BLTTK-31/32/33/34
E-PLY-BLTTK-32	S-PLY-BLTTK-31/32/33/34
E-PLY-BLTTK-33	S-PLY-BLTTK-31/32/33/34
E-PLY-BLTTK-34	S-PLY-BLTTK-31/32/33/34
E-PLY-BLTTK-35	S-PLY-BLTTK-35/36/37
E-PLY-BLTTK-36	S-PLY-BLTTK-35/36/37
E-PLY-BLTTK-37	S-PLY-BLTTK-35/36/37
E-PLY-BLTTK-38	S-PLY-BLTTK-38/39
E-PLY-BLTTK-39	S-PLY-BLTTK-38/39
E-PLY-TK-14G	F2
E-PLY-TK-15G	F2
E-PLY-TK-16G	F2
E-PLY-S/WTk-HL-65	F2
E-PLY-MUTK-HL-191A	F2
E-PLY-S/WTk-HL-191B	F2
E-PCO-TK-4	S-PCO-TK-4/5/7/8/9
E-PCO-TK-5	S-PCO-TK-4/5/7/8/9
E-PCO-TK-7	S-PCO-TK-4/5/7/8/9
E-PCO-TK-8	S-PCO-TK-4/5/7/8/9
E-PCO-TK-9	S-PCO-TK-4/5/7/8/9
E-PCO-TK-11	Included with E-PCO-CN-1
E-PCO-CN-1	S-PCO-VJT
E-SDR-NBLT	S-SDR-N/SBLT
E-SDR-SBLT	S-SDR-N/SBLT
E-SDR-1BLT	S-SDR-1BLT
E-SDR-2BLT	S-SDR-2BLT
E-SDR-EBLT	S-SDR-EBLT
E-SDR-WBLT	S-SDR-WBLT
E-SDR-1SD	S-SDR-1SD
E-SDR-2SD	S-SDR-2SD

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Attachment A

E-SDR-2SDCYC	S-SDR-2SD
E-DRY-CAGTK-103	F2
E-DRY-CAGTK-106	F2
E-DRY-FTK-202	F2
E-DRY-FTK-203	F2
E-DRY-FTK-204	F2
E-DRY-NTK-15H	S-DRY-NC/W
E-DRY-NSCR-1	S-DRY-NC/W
E-DRY-NTK-16H	S-DRY-NC/W
E-DRY-NTK-17H	S-DRY-NC/W
E-DRY-NSCR-2	S-DRY-NC/W
E-DRY-NTK-18H	S-DRY-NC/W
E-DRY-NPRS-1	S-DRY-NPRS/NDR1
E-DRY-NGR-1H	S-DRY-NPRS/NDR1
E-DRY-NDR	S-DRY-NPRS/NDR1, S-DRY-NDR2, S-DRY-NDR3
E-DRY-PSTK-301	S-DRY-PSBL-300
E-DRY-PSSCR-301A	S-DRY-PSBL-300
E-DRY-PSTK-306	S-DRY-PSBL-300
E-DRY-PSTK-302	S-DRY-PSBL-300
E-DRY-PSSCR-302A	S-DRY-PSBL-300
E-DRY-PSTK-303A	S-DRY-PSBL-300
E-DRY-PSSCR-302B	S-DRY-PSBL-300
E-DRY-PSTK-303B	S-DRY-PSBL-300
E-DRY-PSSCR-303	S-DRY-PSBL-300
E-DRY-PSTK-304	S-DRY-PSBL-300
E-DRY-PSSCR-304	S-DRY-PSBL-300
E-DRY-PSPRS-300	S-DRY-PSBL-300 S-DRY-PSBL-302
E-DRY-PSDR	S-DRY-PSBL-301
E-PEL-PEL-1	F2
E-PEL-TK-2	F2
E-PEL-SEP-2	S-PEL-SEP-2

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S1.a.iii.: Compliance is determined by tracking daily production by product and dry weight and calculating daily VOC emissions utilizing approved material balance calculations as specified in Title V Permit Condition S2.a.iii. Records of these results are maintained, and reports are made semi-annually per Title V Permit Condition S2.a.iii. Data from this method would be considered continuous since daily VOC emissions were calculated for every production day of the reporting period, all records were maintained, and all reports were submitted per Permit General Condition 14. Compliance is continuous.

4. SECTION C – COMPLIANCE STATUS

S1.a.iv.(1): For emission point E-PLY-PAMU the annual VOC emissions shall not exceed 0.359 TPY.

S1.a.iv.(2): For non-VOC BACT emission points E-PLY-TK-14G, E-PLY-TK-15G, E-PLY-TK-16G, E-PLY-S/WTk-HL-191B and E-DRY-CAGTK-103, the source wide cumulative VOC emissions shall be less than or equal to 5 TPY.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S1.a.iv.(1-2): BACT analysis and calculations of emissions demonstrate that none of these VOC emissions limits were exceeded during the reporting period. Compliance is continuous.

5. SECTION C – COMPLIANCE STATUS

S1.a.iv.(3)(a-b): For emission points E-PLY-TK-103C, E-PLY-PLY-37 and E-PLY-PLY-38, the Operator shall utilize Control Device C-PLY-TCO when venting of emissions occurs, and Control Device C-PLY-TCO shall operate with a minimum catalyst bed temperature of 450°F.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S1.a.iv.(3)(a-b): The operating temperature of the TCO was monitored utilizing a temperature monitoring device during all operating cycles of the TCO per Title V Permit Condition S2.a.iv.(2)(a-b). The results of this monitoring were recorded continuously on charts which are maintained onsite. Semi-annual reporting of these results were made per Title V Permit Condition S3.a.iv.(1)(a-g). TCO catalyst bed temperature is also recorded electronically. Compliance is continuous.

6. SECTION C – COMPLIANCE STATUS

S1.a.iv.(4): For the following Emission Points the combined annual VOC emissions shall not exceed 30.256 TPY.

<u>Emission Unit ID</u>	<u>Stack ID</u>	<u>Compliance</u>
E-DRY-PSTK-301	S-DRY-PSBL-300	<i>CONTINUOUS COMPLIANCE FOR ALL EMISSION POINTS</i>
E-DRY-PSSCR-301A	S-DRY-PSBL-300	
E-DRY-PSTK-306	S-DRY-PSBL-300	
E-DRY-PSTK-302	S-DRY-PSBL-300	
E-DRY-PSSCR-302A	S-DRY-PSBL-300	
E-DRY-PSTK-303A	S-DRY-PSBL-300	
E-DRY-PSSCR-302B	S-DRY-PSBL-300	

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E-DRY-PSTK-303B	S-DRY-PSBL-300
E-DRY-PSSCR-303	S-DRY-PSBL-300
E-DRY-PSTK-304	S-DRY-PSBL-300
E-DRY-PSSCR-304	S-DRY-PSBL-300
E-DRY-PSPRS-300	S-DRY-PSBL-300, S-DRY-PSBL-302
E-DRY-PSDR	S-DRY-PSBL-301

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S1.a.iv.(4): Emissions calculations based on residual monomers document that emissions from these points do not exceed the permit limits during the reporting period. Compliance is continuous.

7. SECTION C – COMPLIANCE STATUS

S1.a.iv.(5): For the following Emission Points: E-PEL-PEL-1, E-PEL-TK-2, and E-PEL-SEP-2, the combined VOC emissions shall not exceed 5 TPY.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S1.a.iv.(5): Emissions calculations based on residual monomers document that emissions from these points do not exceed the permit limits during the reporting period. Compliance is continuous.

8. SECTION C – COMPLIANCE STATUS

S1.a.v.(1)(a-f): For Emission Point E-MSC-PRTWSH emissions are to be controlled by having a tightly fitted defect free lid; solvent drains back to an internal tank; the apparatus is properly labeled; solvent stream shall be a stream, work area fans shall not blow across cleaner, equipment shall be maintained free of any leaks.

S1.a.v.(2)(a-g) and S1.a.v.(3): For Emission Point E-MSC-PRTWSH the Operator shall insure that waste solvent shall not be transferred in a manner such that >20% can evaporate; solvent in the cleaner shall not exceed the fill line; lid shall be closed not in use; drag out loss will be minimized; parts will drain properly to the cleaner tank; any spills will be immediately cleaned up and clean up materials placed in enclosed storage; absorbent materials shall not be cleaned in a cold cleaner; no solvent with a vapor pressure exceeding 1.0 mmHg @ 20°C may be used in a cold cleaner.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S1.a.v.(1-3): Cold solvents parts washers are being maintained per the above regulatory constraints. Compliance is continuous.

9. SECTION C – COMPLIANCE STATUS

S1.b.i. – The owner or operator shall not cause, suffer, allow, or permit the emissions into the open air of particulate matter from any affected facility that is in excess of the quantity specified in Table 1 of the regulatory allowable for applicable Regulation 6.09 or 7.08.

<u>Emission Unit ID</u>	<u>Stack ID</u>	<u>Compliance</u>
E-SDR-1SD	S-SDR-1SD	Continuous
E-SDR-1SDHPR-1	S-SDR-1SD	Compliance for all
E-SDR-1SD-SCR-5	S-SDR-1SD	Emission Points
E-SDR-1SDHPR-4	S-SDR-1SD	
E-SDR-1SDPKG	S-SDR-1SD	
E-SDR-2SD	S-SDR-2SDRTO	
E-SDR-2SDCYC	S-SDR-2SDRTO	
E-SDR-2SDRP	S-SDR-2SDRTO	
E-DRY-NDR		
E-DRY-NCC	S-DRY-NSED-2	
E-DRY-NCP	S-DRY-NCC	
E-DRY-NFE-2	S-DRY-NFE-2	
E-DRY-PSDR	S-DRY-PSBL-301	

S1.b.ii: For Emission Point E-SDR-2SDHPR-1, when in operation, particulate matter (PM) emissions are limited to 1.0 lb/hr.

S1.b.iii: For Emission Points E-SDR-2SDSEP-1, E-SDR-2SDBPE, and E-SDR-2SDBPW, when in operation, total combined PM emission limit is 2.3 lb/hr.

S1.b.iv: For Emission Points E-PEL-SEP-1 and E-PEL-SEP-2, when in operation, the PM emission limit for each individual Emission Point is 1.0 lb/hr.

S1.b.v: For Emission Points E-PEL-CV-2 and E-PEL-SEP-3 and E-PEL-SEP-4, when in operation, the PM emission limit for E-PEL-CV-2 and either E-PEL-SEP-3 or E-PEL-SEP-4 is 1.4 lb/hr.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S1.b.i-v.: A combination of visible emissions surveys and visible monitoring (using throughputs and approved emission factors) of these sources has found that there were no emissions from these Emission Points during the reporting period. Compliance was continuous.

10. SECTION C – COMPLIANCE STATUS

S1.c.: – For regulated emission points, the owner or operator shall not cause to be discharged into the atmosphere from any affected facility, or from any air pollution control equipment installed on any affected facility, any gasses that may contain particulate matter that is equal to or greater than 20% opacity.

<u>Emission Unit ID</u>	<u>Stack ID</u>	<u>Compliance</u>
E-SDR-1SD	S-SDR-1SD	Continuous Compliance for all Emission Points
E-SDR-2SD	S-SDR-2SD	
E-SDR-2SDCYC	S-SDR-2SD	
E-SDR-2SDRP	S-SDR-2SD	
E-SDR-2SDHPR-1	S-SDR-SDRHPR-1	
E-SDR-2SDSEP-1	S-SDR-2SDSEP-1	
E-SDR-2SDBPE	S-SDR-2SDSEP-1	
E-SDR-2SDBPW	S-SDR-2SDSEP-1	
E-SDR-1SDHPR-1	S-SDR-1SDHPR-1	
E-SDR-1SDSCR-5	S-SDR-1SDSCR-5	
E-SDR-1SDHPR-4	S-SDR-1SDHPR-4	
E-SDR-1SDPKG	"F"	
E-DRY-NFE-2	S-DRY-NFE-2	
E-DRY-NDR	S-DRY-NPRS/NDR1, S-DRY-NDR2, S-DRY-NDR3	
E-DRY-NCC	S-DRY-NSED-2	
E-DRY-NCP	S-DRY-NCC	
E-DRY-PSDR	S-DRY-PSBL-301	
E-PEL-SEP-1	S-PEL-SEP-1	
E-PEL-SEP-2	S-PEL-SEP-2	
E-PEL-CV-2	S-PEL-FIL-3	
E-PEL-SEP-3	S-PEL-FIL-3	
E-PEL-SEP-4	S-PEL-FIL-3	
E-MSC-EMGEN01	S-MSC-EMGEN01	

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S1.c.: For all but three points, visible emissions surveys are conducted on a monthly basis per Title V Permit Condition S2.c.i-iv. Three points, where operations are sporadic are monitored

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for operations on a daily basis, and checked when operating per Title V Permit Condition S2.c.i-iv. Visible emissions survey results are entered on a survey form per Title V Permit Condition S2.c.i-iv. Results of all visible emissions surveys are reported to the District on a semi-annual basis per Title V Permit Condition S3.c.i-iv. Compliance data from this method is continuous.

11. SECTION C – COMPLIANCE STATUS

S1.d.i.(1). For the Monomer Recovery System (MRS) Vent Control System Control Device C-PLY-MRV-TO, when operating and controlling the vent stream from C-PLY-MRS, the MRS vent stream shall not be discharged uncontrolled to the atmosphere. At all times the MRS is operating, the vent stream shall be controlled by the Thermal Oxidizer (C-PLY-MRV-TO), or the Thermal Catalytic Oxidizer (C-PLY-TCO), or held in the Buffer Tanks (TO-BTTK-1 and TO-BTTK-2).

S1.d.i.(2-4): The Thermal Oxidizer must have a minimal residence time of 0.50 seconds, a maximum destruction efficiency of 99.9%, and be operated at a minimum combustion temperature of 1250°F.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S1.d.i-ii.: Operation of the Thermal Oxidizer is constantly monitored. At no time during the reporting period did the MRS Vent Stream discharge to the atmosphere uncontrolled. The Thermal Oxidizer was used exclusively to control the MRS Vent Stream during the reporting period. The Thermal Oxidizer was not operated at a temperature below the minimum combustion temperature of 1250°F. The tested destruction efficiency of the Thermal Oxidizer exceeds 99.9%. Compliance was continuous.

12. SECTION C – COMPLIANCE STATUS

S1.d.ii.(1-4). For MRS Vent Control System Control Device C-PLY-TCO, when operating and controlling the Monomer Recovery System (C-PLY-MRS): The MRS vent shall not be discharged uncontrolled to the atmosphere. At all times that C-PLY-MRS is operating, the vent stream shall be controlled by the Thermal Catalytic Oxidizer (C-PLY-TCO) or the Thermal Oxidizer (C-PLY-MRV-TO), or held in the Buffer Tanks (TO-BTTK-1 and TO-BTTK-2). The Thermal Catalytic Oxidizer (C-PLY-TCO) shall be operated with a maximum airflow of 3,500 scfm from the blower, have a minimum destruction efficiency of 99.5%, and operated at a minimum temperature of 962°F.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S1.d.i.(1-4): The Thermal Oxidizer (C-PLY-MRV-TO) was used exclusively to control the MRS Vent Stream during the reporting period. The Thermal Catalytic Oxidizer (C-PLY-TCO) was no longer controlling the MRS vent stream. During the cited reporting time there were no uncontrolled discharges to the atmosphere from C-PLY-MRS. Compliance was continuous.

13. SECTION C – COMPLIANCE STATUS

S1.d.iii.(1-5).: For Control Device C-SDR-2SDRTO, controlling Emission Points ESDR- 2SD and E-SDR-2SDCYC, while No. 2 Spray Dryer produces Styrene Acrylonitrile (SAN) resin (Operating scenario 1), Except for allowed emergency shutdown events, at all times Emission Point E-SDR-2SD is operating and latex is being fed to No. 2 Spray Dryer, except for allowed emergency shutdown events, when latex is being fed to No. 2 Spray Dryer, the owner or operator shall not discharge to the atmosphere from No. 2 Spray Dryer Regenerative Thermal Oxidizer (C-SDR-2SDRTO) acrylonitrile emissions in excess of 1293.6 pounds per 12-consecutive month period. The No. 2 Spray Dryer Regenerative Thermal Oxidizer (C-SDR- 2SDRTO) shall have a minimum destruction efficiency of 85% for acrylonitrile. The No. 2 Spray Dryer vent stream shall be allowed to be discharged to the atmosphere uncontrolled for TACs during emergency shutdown events. The individual uncontrolled TAC emissions discharged during such emergency shutdown events shall not exceed the 2 lbs/calendar year acrylonitrile by 12-consecutive month period, when latex is not being fed to No. 2 Spray Dryer or the volume of air in the No. 2 Spray Dryer System is not associated with an emergency shutdown event, the No. 2 Spray Dryer Regenerative Thermal Oxidizer (C-SDR-2SDRTO) may be by-passed.

S1.d.iv.(1-3) For Control Device C-SDR-2SDRTO, controlling Emission Points ESDR- 2SD and E-SDR-2SDCYC, while No. 2 Spray Dryer produces Nitrile Butadiene Rubber (NBR) resin (Operating scenario 2), No. 2 Spray Dryer to produce NBR without running RTO (C-SDR-2SDRTO) and exhaust emissions from spray drying NBR to the bypass stack (S-SDR- 2SD). The owner or operator shall increase the height of the bypass stack (S-SDR-2SD) from 69 feet to 95 feet before bypass any exhaust emissions (S-SDR-2SD), except for allowed emergency shutdown events, when latex is being fed to No. 2 Spray Dryer, the owner or operator shall not discharge to the atmosphere from the No. 2 Spray Dryer in excess of 2,000 pounds Acrylonitrile and 500 pounds 1,3-Butadiene per 12-consecutive month period.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S1.d.iii.(1-5).: Control Device C-SDR-2SDRTO was operated at all times while latex was being fed to E-SDR-2SD during the reporting period. Acrylonitrile emissions were below the permit limit. All operation time of the C-SDR-2SDRTO was monitored, and operating temperatures never fell below 1500°F. Stack testing of C-SDR-2SDRTO has established that destruction efficiency exceeds 85% for acrylonitrile. There were no emergency shutdown events resulting in uncontrolled TAC emissions during the reporting period. Compliance was continuous.

S1.d.iv.(1-3) The No. 2 Spray Dryer produced NBR without running RTO (C-SDR-2SDRTO) and exhaust emissions from spray drying NBR to the bypass stack (S-SDR- 2SD). The height of the bypass stack (S-SDR-2SD) is 95 feet before bypass any exhaust emissions (S-SDR-2SD). There was no emission exceedance for Acrylonitrile and 1,3-Butadiene.

14. SECTION C – COMPLIANCE STATUS

S1.d.v.: For new individual STAR Process Emission Point E-PLY-PLY-38, the Operator shall utilize Control Device C-PLY-TCO while E-PLY-PLY-38 is operating.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S1.d.v.: Control Device C-PLY-TCO was in use at all times that Emission Point E-PLY-PLY-38 was in operation during the reporting period. Compliance was continuous.

15. SECTION C – COMPLIANCE STATUS

S1.d.vi.: The Operator shall achieve plant wide Environmental Acceptability Goals by not exceeding monthly post monitoring stripping latex residual monomer levels of 100 ppm acrylonitrile in NBR Bale Rubber and NBR Powder Rubber, 250 ppm acrylonitrile in NBR Liquid Rubber, 10 ppm butadiene in NBR Bale Rubber, and 25 ppm in NBR Powder Rubber and NBR Liquid Rubber.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S1.d.vi.: Post stripping residual monomer samples are collected and analyzed on a daily basis when each of these types of products are processed. Data are used to calculate the post stripping residual monomer average. No post stripping residual monomer monthly average exceeded the permit limits for acrylonitrile or butadiene during the reporting period. Compliance was continuous.

16. SECTION C – COMPLIANCE STATUS

S1.e.: For Emission Point E-MSC-EMGEN01, the owner or Operator shall comply with 40 CFR Part 60 Subpart IIII and 40 CFR Part 63 Subpart ZZZZ per Appendix E.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S1.e.: Emission Point E-MSC-EMGEN01 operated less than 500 hours during the 12 consecutive month period. No pollutants causing injury, detriment, nuisance or annoyance to the public were released during the reporting period. The E-MSC-EMGEN01 was operated in accordance with 40 CFR Part 60 Subpart IIII and 40 CFR Part 63 Subpart ZZZZ during the reporting period. Compliance was continuous.

17. SECTION C – COMPLIANCE STATUS

S1.f.: The Operator shall comply with the Risk Management Plan for the handling of acrylonitrile; ammonia (anhydrous); and 1,3-butadiene submitted on June 8, 2009.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S1.f.: The Operator has complied with the June 8, 2009 Risk Management Plan for the handling of acrylonitrile; ammonia (anhydrous); and 1,3-butadiene.

18. SECTION C – COMPLIANCE STATUS

S2.a.i.(1-2): The Operator shall maintain the required records for a minimum of 5 years and make records available to the district upon request. For equipment regulated under Regulation 6.13 or 7.12 the Operator shall maintain Safety Data Sheets for VOCs contained in storage tanks exempt from these Regulations.

<u>Emission Unit ID</u>	<u>Stack ID</u>	<u>Compliance</u>
E-TKF-TK-403	S-TKF-TK-403	Continuous compliance for all Emission Points
E-TKF-TK-408	S-TKF-TK-408	
E-TKF-TK-411	S-TKF-TK-411	
E-TKF-TK-412	S-TKF-TK-412	
E-PLY-TK-150	S-PLY-TK-150	
E-PLY-TK-152	S-PLY-TK-152	
E-PLY-MRSSTK	S-PLY-MRS-TO	

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S2.a.i.(1-2): Safety Data Sheets are being maintained on site for all listed equipment. Compliance is continuous.

19. SECTION C – COMPLIANCE STATUS

S2.a.ii.(1-2): For Emission Points subject to Regulation 6.24, when the Monomer Recovery System (C-PLY-MRS) is operational, the Operator shall on a daily basis, obtain post-stripping monomer samples to be analyzed for residual acrylonitrile and butadiene. The Operator shall calculate and record the average calendar monthly post-stripping residual acrylonitrile and butadiene ppm concentrations based on post-stripping sampling conducted during the calendar month.

<u>Emission Unit ID</u>	<u>Stack ID</u>	<u>Compliance</u>
E-TKF-100RCU	S-TKF-100CFU	Continuous compliance for all Emissions Points
E-TKF-100TU	S-TKF-100CFU	
E-TKF-400U	F2	
E-PLY-SPT-1	“	
E-PLY-SPT-2	“	

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E-PLY-SPT-3	“
E-PLY-SPT-4	“
E-PLY-SPT-5	“
E-PLY-SPT-6	“
E-PLY-SPT-7	“
E-PLY-SPT-8	“
E-PLY-TK-26	“
E-PLY-MTK-101	“
E-PLY-MTK-102	“
E-PLY-TK-113	“
E-PLY-PLY-1	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-2	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-3	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-4	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-5	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-6	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-7	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-8	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-9	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-10	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-11	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-12	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-13	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-14	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-15	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-16	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-17	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-18	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-19	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-20	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-21	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-22	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-23	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-24	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-25	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-26	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-27	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-28	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-29	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-30	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-31	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-32	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-33	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-34	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-35	S-PLY-PVJ or S-PLY-MRS

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E-PLY-PLY-36	S-PLY-PVJ or S-PLY-MRS
E-PLY-BDTTK-1	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-2	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-3	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-4	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-5	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-6	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-7	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-8	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-9	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-10	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-11	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-12	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-14	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-15	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-16	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-17	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-18	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-TK-101	S-PLY-TCO
E-PLY-TK-102	S-PLY-TCO
E-PLY-CN101/2/VJ	S-PLY-TCO
E-PLY-BLTTK-13	S-PLY-BLTTK-13/14/15/16
E-PLY-BLTTK-14	S-PLY-BLTTK-13/14/15/16
E-PLY-BLTTK-15	S-PLY-BLTTK-13/14/15/16
E-PLY-BLTTK-16	S-PLY-BLTTK-13/14/15/16
E-PLY-BLTTK-17	S-PLY-BLTTK-17/18/19/20
E-PLY-BLTTK-18	S-PLY-BLTTK-17/18/19/20
E-PLY-BLTTK-19	S-PLY-BLTTK-17/18/19/20
E-PLY-BLTTK-20	S-PLY-BLTTK-17/18/19/20
E-PLY-BLTTK-21	S-PLY-BLTTK-21/22/23/24
E-PLY-BLTTK-22	S-PLY-BLTTK-21/22/23/24
E-PLY-BLTTK-23	S-PLY-BLTTK-21/22/23/24
E-PLY-BLTTK-24	S-PLY-BLTTK-21/22/23/24
E-PLY-BLTTK-25	S-PLY-BLTTK-25/26
E-PLY-BLTTK-26	S-PLY-BLTTK-25/26
E-PLY-BLTTK-27	S-PLY-BLTTK-27/28/29/30
E-PLY-BLTTK-28	S-PLY-BLTTK-27/28/29/30
E-PLY-BLTTK-29	S-PLY-BLTTK-27/28/29/30
E-PLY-BLTTK-30	S-PLY-BLTTK-27/28/29/30
E-PLY-BLTTK-31	S-PLY-BLTTK-31/32/33/34
E-PLY-BLTTK-32	S-PLY-BLTTK-31/32/33/34
E-PLY-BLTTK-33	S-PLY-BLTTK-31/32/33/34
E-PLY-BLTTK-34	S-PLY-BLTTK-31/32/33/34
E-PLY-BLTTK-35	S-PLY-BLTTK-35/36/37
E-PLY-BLTTK-36	S-PLY-BLTTK-35/36/37

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E-PLY-BLTTK-37	S-PLY-BLTTK-35/36/37
E-PLY-BLTTK-38	S-PLY-BLTTK-38/39
E-PLY-BLTTK-39	S-PLY-BLTTK-38/39
E-PLY-S/WTk-HL-65	F2
E-PLY-MUTK-HL-191A	F2
E-PCO-TK-4	S-PCO-TK-4/5/7/8/9
E-PCO-TK-5	S-PCO-TK-4/5/7/8/9
E-PCO-TK-7	S-PCO-TK-4/5/7/8/9
E-PCO-TK-8	S-PCO-TK-4/5/7/8/9
E-PCO-TK-9	S-PCO-TK-4/5/7/8/9
E-PCO-TK-11	Included with E-PCO-CN-1
E-PCO-CN-1	S-PCO-VJT
E-SDR-NBLT	S-SDR-N/SBLT
E-SDR-SBLT	S-SDR-N/SBLT
E-SDR-1BLT	S-SDR-1BLT
E-SDR-2BLT	S-SDR-2BLT
E-SDR-EBLT	S-SDR-EBLT
E-SDR-WBLT	S-SDR-WBLT
E-SDR-1SD	S-SDR-1SD
E-SDR-2SD	S-SDR-2SD
E-SDR-2SDCYC	S-SDR-2SD
E-DRY-FTK-202	F2
E-DRY-FTK-203	F2
E-DRY-FTK-204	F2
E-DRY-NTK-15H	S-DRY-NC/W
E-DRY-NSCR-1	S-DRY-NC/W
E-DRY-NTK-16H	S-DRY-NC/W
E-DRY-NTK-17H	S-DRY-NC/W
E-DRY-NTK-18H	S-DRY-NC/W
E-DRY-NPRS-1	S-DRY-NPRS/NDR1
E-DRY-NGR-1H	S-DRY-NPRS/NDR1
E-DRY-NDR	S-DRY-NPRS/NDR1, S-DRY-NDR2, S-DRY-NDR3
E-DRY-NSCR-2	S-DRY-NC/W

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S2.a.ii.(1-2): Post-stripping residual monomer samples were collected each day of the reporting period and analyzed for acrylonitrile and butadiene. Monthly post-stripping monomer averages have been calculated for each month of the reporting period, and records are being maintained. Compliance is intermittent.

SECTION E – DEVIATIONS

When the MRS (C-PLY-MRS) was operational, post-stripping residual monomer samples were collected and analyzed during the compliance reporting period. Four instances when no samples were collected due to minimal production. Measures were put in place to eliminate this from happening in future. Permit required calculations and records were maintained.

20. SECTION C – COMPLIANCE STATUS

S2.a.iii.: For Emission Points subject to Regulation 6.43, the Operator shall maintain production records including product type and daily production. These records, along with VOC emissions factors based on material balances will be utilized to calculate daily VOC emissions to demonstrate compliance with emissions limits.

For emission points subject to Regulation 6.43, the owner or operator shall not exceed the plant wide VOC emissions limit of 4,133 pounds per day.

<u>Emission Unit ID</u>	<u>Stack ID</u>	<u>Compliance</u>
E-TKF-100RCU	S-TKF-100CFU	Continuous Compliance for all Emission Points
E-TKF-100TU	S-TKF-100CFU	
E-TKF-TK-101	S-TKF-TK-101	
E-TKF-TK-102	S-TKF-TK-102	
E-TKF-TK-103	S-TKF-TK-103	
E-TKF-TK-104	S-TKF-TK-104	
E-TKF-TK-105	S-TKF-TK-105	
E-TKF-TK-106	S-TKF-TK-106	
E-TKF-TK-107	S-TKF-TK-107	
E-TKF-TK-108	S-TKF-TK-108	
E-TKF-TK-109A	S-TKF-TK-109A	
E-TKF-400U	F2	
E-TKF-TK-401	S-TKF-TK-401	
E-TKF-TK-402	S-TKF-TK-402	
E-TKF-TK-403	S-TKF-TK-403	
E-TKF-TK-404	S-TKF-TK-404	
E-TKF-TK-405	S-TKF-TK-405	
E-TKF-TK-406	S-TKF-TK-406	
E-TKF-TK-407	S-TKF-TK-407	
E-TKF-TK-408	S-TKF-TK-408	
E-TKF-TK-409	S-TKF-TK-409	
E-TKF-TK-410	S-TKF-TK-410	
E-TKF-TK-411	S-TKF-TK-411	
E-TKF-TK-412	S-TKF-TK-412	

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E-PLY-MRSSTK	F2
E-PLY-PAMU	F2
E-PLY-TK-304	S-PLY-TK-304
E-PLY-TK-305	S-PLY-TK-305
E-PLY-TK-306	S-PLY-TK-306
E-PLY-TK-150	S-PLY-TK-150
E-PLY-TK-152	S-PLY-TK-152
E-PLY-SPT-1	F2
E-PLY-SPT-2	F2
E-PLY-SPT-3	F2
E-PLY-SPT-4	F2
E-PLY-SPT-5	F2
E-PLY-SPT-6	F2
E-PLY-SPT-7	F2
E-PLY-SPT-8	F2
E-PLY-TK-26	F2
E-PLY-MTK-101	F2
E-PLY-MTK-102	F2
E-PLY-TK-113	F2
E-PLY-PLY-1	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-2	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-3	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-4	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-5	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-6	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-7	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-8	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-9	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-10	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-11	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-12	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-13	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-14	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-15	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-16	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-17	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-18	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-19	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-20	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-21	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-22	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-23	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-24	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-25	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-26	S-PLY-PVJ or S-PLY-MRS

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E-PLY-PLY-27	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-28	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-29	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-30	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-31	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-32	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-33	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-34	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-35	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-36	S-PLY-PVJ or S-PLY-MRS
E-PLY-BDTK-1	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-2	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-3	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-4	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-5	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-6	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-7	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-8	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-9	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-10	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-11	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-12	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-14	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-15	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-16	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-17	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-18	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-TO-113	S-PLY-TO-113
E-PLY-TK-101	S-PLY-TCO
E-PLY-TK-102	S-PLY-TCO
E-PLY-PLY-37	S-PLY-TCO
E-PLY-PLY-38	S-PLY-TCO
E-PLY-CN101/2/VJ	S-PLY-TCO
E-PLY-BLTTK-13	S-PLY-BLTTK-14/14/15/16
E-PLY-BLTTK-14	S-PLY-BLTTK-14/14/15/16
E-PLY-BLTTK-15	S-PLY-BLTTK-14/14/15/16
E-PLY-BLTTK-16	S-PLY-BLTTK-13/14/15/16
E-PLY-BLTTK-17	S-PLY-BLTTK-17/18/19/20
E-PLY-BLTTK-18	S-PLY-BLTTK-17/18/19/20
E-PLY-BLTTK-19	S-PLY-BLTTK-17/18/19/20
E-PLY-BLTTK-20	S-PLY-BLTTK-17/18/19/20
E-PLY-BLTTK-21	S-PLY-BLTTK-21/22/23/24
E-PLY-BLTTK-22	S-PLY-BLTTK-21/22/23/24
E-PLY-BLTTK-23	S-PLY-BLTTK-21/22/23/24
E-PLY-BLTTK-24	S-PLY-BLTTK-21/22/23/24

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E-PLY-BLTTK-25	S-PLY-BLTTK-25/26
E-PLY-BLTTK-26	S-PLY-BLTTK-25/26
E-PLY-BLTTK-27	S-PLY-BLTTK-27/28/29/30
E-PLY-BLTTK-28	S-PLY-BLTTK-27/28/29/30
E-PLY-BLTTK-29	S-PLY-BLTTK-27/28/29/30
E-PLY-BLTTK-30	S-PLY-BLTTK-27/28/29/30
E-PLY-BLTTK-31	S-PLY-BLTTK-31/32/33/34
E-PLY-BLTTK-32	S-PLY-BLTTK-31/32/33/34
E-PLY-BLTTK-33	S-PLY-BLTTK-31/32/33/34
E-PLY-BLTTK-34	S-PLY-BLTTK-31/32/33/34
E-PLY-BLTTK-35	S-PLY-BLTTK-35/36/37
E-PLY-BLTTK-36	S-PLY-BLTTK-35/36/37
E-PLY-BLTTK-37	S-PLY-BLTTK-35/36/37
E-PLY-BLTTK-38	S-PLY-BLTTK-38/39
E-PLY-BLTTK-39	S-PLY-BLTTK-38/39
E-PLY-TK-14G	F2
E-PLY-TK-15G	F2
E-PLY-TK-16G	F2
E-PLY-S/WTk-HL-65	F2
E-PLY-MUTK-HL-191A	F2
E-PLY-S/WTk-HL-191B	F2
E-PCO-TK-4	S-PCO-TK-4/5/7/8/9
E-PCO-TK-5	S-PCO-TK-4/5/7/8/9
E-PCO-TK-7	S-PCO-TK-4/5/7/8/9
E-PCO-TK-8	S-PCO-TK-4/5/7/8/9
E-PCO-TK-9	S-PCO-TK-4/5/7/8/9
E-PCO-TK-11	Included with E-PCO-CN-1
E-PCO-CN-1	S-PCO-VJT
E-SDR-NBLT	S-SDR-N/SBLT
E-SDR-SBLT	S-SDR-N/SBLT
E-SDR-1BLT	S-SDR-1BLT
E-SDR-2BLT	S-SDR-2BLT
E-SDR-EBLT	S-SDR-EBLT
E-SDR-WBLT	S-SDR-WBLT
E-SDR-1SD	S-SDR-1SD
E-SDR-2SD	S-SDR-2SD
E-SDR-2SDCYC	S-SDR-2SD
E-DRY-CAGTK-103	F2
E-DRY-CAG-TK-103	F2
E-DRY-CAG-TK-106	F2
E-DRY-FTK-202	F2
E-DRY-FTK-203	F2
E-DRY-FTK-204	F2
E-DRY-NTK-15H	S-DRY-NC/W
E-DRY-NSCR-1	S-DRY-NC/W

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E-DRY-NTK-16H	S-DRY-NC/W
E-DRY-NTK-17H	S-DRY-NC/W
E-DRY-NSCR-2	S-DRY-NC/W
E-DRY-NTK-18H	S-DRY-NC/W
E-DRY-NPRS-1	S-DRY-NPRS/NDR1
E-DRY-NGR-1H	S-DRY-NPRS/NDR1
E-DRY-NDR	S-DRY-NPRS/NDR1, S-DRY-NDR2, S-DRY-NDR3
E-DRY-PSTK-301	S-DRY-PSBL-300
E-DRY-PSSCR-301A	S-DRY-PSBL-300
E-DRY-PSTK-306	S-DRY-PSBL-300
E-DRY-PSTK-302	S-DRY-PSBL-300
E-DRY-PSSCR-302A	S-DRY-PSBL-300
E-DRY-PSTK-303A	S-DRY-PSBL-300
E-DRY-PSSCR-302B	S-DRY-PSBL-300
E-DRY-PSTK-303B	S-DRY-PSBL-300
E-DRY-PSSCR-303	S-DRY-PSBL-300
E-DRY-PSTK-304	S-DRY-PSBL-300
E-DRY-PSSCR-304	S-DRY-PSBL-300
E-DRY-PSPRS-300	S-DRY-PSBL-300
	S-DRY-PSBL-302
E-DRY-PSDR	S-DRY-PSBL-301
E-PEL-PEL-1	F2
E-PEL-TK-2	F2
E-PEL-SEP-2	S-PEL-SEP-2

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S2.a.iii.: Daily production records are collected and maintained for all products produced. Production data is entered into a spreadsheet and daily VOC emissions are calculated utilizing product-specific emission factors. No daily VOC emissions total during the reporting period exceeded the permit allowed limit. Compliance was continuous.

21. SECTION C – COMPLIANCE STATUS

S2.a.iv.(2) (a-b): For Emission Points E-PLY-PLY-37 and E-PLY-PLY-38, the Operator shall keep records of the times that Control Device C-PLY-TCO is not in operation and E-PLY-PLY-37 or E-PLY-PLY-38 is in operation and venting, and shall, during each operating cycle of C-PLY-TCO while E-PLY-PLY-37 or E-PLY-PLY-38 is in operation monitor and record C-PLY-TCO catalyst bed temperature.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S2.a.iv.(2) (a-b): During the reporting period Control Device C-PLY-TCO was in operation at all times when E-PLY-PLY-37 or E-PLY-PLY-38 was in operation and controlled all venting from these Emission Points. The catalyst bed temperature of C-PLY-TCO was monitored and recorded at all times when the Control Device was in operation. Compliance was continuous.

22. SECTION C – COMPLIANCE STATUS

S2.a.v.(1) (a-d): For Emission Point E-MSC-PRTWSH, the Operator shall maintain records that include the name and address of the solvent supplier, the date of purchase, type of solvent, the vapor pressure of the solvent measured in mmHg at 20°C.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S2.a.v.(1) (a-d): During the reporting period, all records required have been maintained for E-MSC-PRTWSH. Compliance is continuous.

23. SECTION C – COMPLIANCE STATUS

S2.b.i.(1): For Emission Points E-SDR-1SD and E-SDR-1SDHPR-1 controlled by Control Device C-SDR-1SD, the Operator shall, when latex is being fed to No. 1 Spray Dryer, monitor and record daily the system differential pressure to ensure operation is in the standard operating pressure range.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S2.b.i.(1): System differential pressure was monitored and recorded on a daily basis during all days the No. 1 Spray Dryer was being fed latex. All operations were within the standard operating pressure range. Compliance was continuous.

24. SECTION C – COMPLIANCE STATUS

S2.b.i.(2): For Emission Points E-SDR-2SD and E-SDR-2SDCYC and E-SDR-2SDRP controlled by Control Device C-SDR-2SD, the Operator shall, when latex is being fed to No. 2 Spray Dryer, monitor and record daily the system differential pressure to ensure operation is in the standard operating pressure range.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S2.b.i.(2): System differential pressure was monitored and recorded on a daily basis during all days the No. 2 Spray Dryer was being fed latex. All operations were within the standard operating pressure range. Compliance was continuous.

25. SECTION C – COMPLIANCE STATUS

S2.b.i.(3)(a-g): The Operator shall monitor and maintain records of all periods bypassing Control Device C-SDR-1SD including date, duration, identification of Emission Points in operation at the time, resultant PM emissions, explanation of the cause, corrective actions taken, and measures to prevent future incidents.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S2.b.i.(3)(a-g): There were no incidents during the reporting period when Control Device C-SDR-1SD was bypassed while the associated Emission Point was in operation. No records were required to be retained. Compliance is continuous.

26. SECTION C – COMPLIANCE STATUS

S2.b.i.(4): The Operator shall perform a monthly visual inspection of Control Device C-SDR-1SD for structural and mechanical integrity, repair defects found within 15 days, and maintain monthly records of the results.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S2.b.i.(4): Control Device was inspected each operating month during the reporting period for all the items listed in this permit condition and inspection results are being retained. If indicated, any repairs were implemented within the 15-day limit. Compliance was continuous.

27. SECTION C – COMPLIANCE STATUS

S2.b.ii.: For Emission Points E-SDR-1SD, E-SDR-1SDHPR-1, E-SDR-2SD (including E-SDR-2SDCYC and E-SDR-2SDRP), the Operator shall keep monthly records of throughput rates, and utilize the calculation equation supplied in this permit condition, including stack test established efficiency to calculate hourly PM emission rates.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S2.b.ii.: For the reporting period, monthly records for the throughput have been maintained, and hourly PM emission rates have been calculated each month utilizing the permit required equation and stack test determined efficiency. Compliance is continuous.

28. SECTION C – COMPLIANCE STATUS

S2.c.i-iv.: For the following Emission Points the Operator shall conduct a monthly one minute visible emissions survey during normal daylight operating hours, shall initiate corrective actions for visible emissions observed within eight hours of observation and perform a Method 9 within

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24 hours if emissions continue, maintain monthly records of visible emissions surveys and Method 9 observations.

<u>Emission Unit ID</u>	<u>Stack ID</u>	<u>Compliance</u>
E-SDR-1SD	S-SDR-1SD	Continuous Compliance for all Emission Points
E-SDR-2SD	S-SDR-2SD	
E-SDR-2SDCYC	S-SDR-2SD	
E-SDR-2SDRP	S-SDR-2SD	
E-SDR-2SDHPR-1	S-SDR-SDRHPR-1	
E-SDR-2SDSEP-1	S-SDR-2SDSEP-1	
E-SDR-2SDBPE	S-SDR-2SDSEP-1	
E-SDR-2SDBPW	S-SDR-2SDSEP-1	
E-DRY-NFE-2	S-DRY-NFE-2	
E-DRY-NDR	S-DRY-NPRS/NDR1, S-DRY-NDR2, S-DRY-NDR3	
E-DRY-NCC	S-DRY-NSED-2	
E-DRY-NCP	S-DRY-NCC	
E-DRY-PSDR	S-DRY-PSBL-301	
E-PEL-SEP-1	S-PEL-SEP-1	
E-PEL-SEP-2	S-PEL-SEP-2	
E-PEL-CV-2	S-PEL-FIL-3	
E-PEL-SEP-3	S-PEL-FIL-3	
E-PEL-SEP-4	S-PEL-FIL-3	

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S2.c.i-iv.: During the reporting period, all listed Emission Points were visible emissions surveyed each month for one minute with no more than four stacks being surveyed simultaneously. Records of these surveys contain all the elements specified in paragraph iii of this permit condition. A negative declaration has been recorded for any Emission Point not operating and visible emissions during a calendar month. During the reporting period there were no visible emissions recorded and no Method 9 observations conducted. Compliance is continuous.

29. SECTION C – COMPLIANCE STATUS

S2.d.i.: The Operator shall maintain records sufficient to demonstrate environmental acceptability. including, but not limited to MSDS, analysis of emissions, and/or modeling results.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S2.d.i.: During the reporting period, SDSs for all plant materials were maintained on site. Modeling of TAC emissions has been conducted, results have been furnished to the District and are being maintained on site.

30. SECTION C – COMPLIANCE STATUS

S2.d.ii.: If a new TAC is introduced, or a TAC content is increased, the Operator shall re-evaluate environmental acceptability and document acceptable emissions.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S2.d.ii.: During the reporting period, there were no new TACs were introduced into the plant. Compliance is continuous.

31. SECTION C – COMPLIANCE STATUS

S2.d.iii.(1-4): For the Monomer Recovery System (MRS) Vent Control System's Thermal Oxidizer Control Device, C-PLY-MRV-TO, when controlling the MRS vent stream, the Operator shall monitor and record the combustion temperature of C-PLY-MRV-TO, shall record dates and times C-PLY-MRV-TO is used to control the MRS vent, maintain a record of any times the vent stream is being held in the MRS Vent Control System's Buffer Tanks (TO-BTTK-1 and TO-BTTK-2), and maintain records of any times the MRS vent stream was discharged to the atmosphere uncontrolled including amount of material discharged.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S2.d.iii.(1-4): During the reporting period, when controlling the MRS vent stream, the operations of C-PLY-MRV-TO were monitored continuously and combustion temperature was recorded. C-PLY-MRV-TO was used continuously to control the MRS vent stream. Records of all times the MRS vent stream was held in the Buffer Tanks was maintained. The MRS vent stream did not discharge to the atmosphere uncontrolled during the reporting period. Compliance is continuous.

32. SECTION C – COMPLIANCE STATUS

S2.d.iv.(1-5): For the MRS Vent Control System Thermal Catalytic Oxidizer Device C-PLY-TCO when controlling the MRS vent stream the Operator shall continuously monitor and record catalyst bed temperature when in operation, keep records of maximum design capacity of fan speed, maintain records of start/stop times either C-PLY-TCO or C-PLY-MRV-TO is controlling the vent stream, maintain records of times vent stream is held in the buffer tanks, and maintain records of any times steam is discharged to the atmosphere uncontrolled and amount of material discharged.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S2.d.iv.(1-5).: For the reporting period the Thermal Catalytic Oxidizer was not used to control the MRS vent stream. The MRS Vent Stream was controlled solely by the Thermal Oxidizer Control Device C-PLY-MRV-TO. Records are maintained for the operations of C-PLY-MRV-TO. The MRS vent stream was not discharged to the atmosphere uncontrolled. Compliance was continuous.

33. SECTION C – COMPLIANCE STATUS

S2.d.v.(1-3).: For the Regenerative Thermal Oxidizer C-SDR-2SDRTO when controlling emission Points C-SDR-2SD and E-SDR-2SDCYC the Operator shall monitor and record combustion temperature of the RTO, calculate and maintain a monthly record of calendar year to date records of controlled acrylonitrile emissions, and maintain records for any emergency shut-down events resulting in uncontrolled emissions to the atmosphere including start/stop time and amount of materials discharged to the atmosphere.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S2.d.v.(1-3).: For the reporting period the Regenerative Thermal Oxidizer C-SDR-2SDRTO was in operation at all times when latex was being fed to C-SDR-2SD, and combustion temperature was monitored and recorded during operation. A record of calendar year to date controlled acrylonitrile calculated emissions is being maintained. There were no emergency shut-down events during the reporting period. Compliance was continuous.

34. SECTION C – COMPLIANCE STATUS

S2.d.vi.: For Emission Points E-PLY-PLY-37 and E-PLY-PLY-38 when processing TAC's above de minimis levels and bypassing Control Device C-PLY-TCO, the Operator must calculate emissions of each TAC discharged and determine if emissions have exceeded environmentally acceptable limits established by modeling.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S2.d.vi.: For the reporting period Control Device C-PLY-TCO was operated at all times Emission Point E-PLY-PLY-37 or E-PLY-PLY-38 were in operation. The Control device was not bypassed, and there were no uncontrolled emissions to the atmosphere. Compliance was continuous.

35. SECTION C – COMPLIANCE STATUS

S2.d.vii.(1-4).: For average post stripping monomer levels of NBR products, the Operator shall, for NBR bale rubber when being run, for NBR powder rubber when being run, and NBR liquid rubber when being run shall obtain a daily post stripping residual acrylonitrile and butadiene

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sample from C-PLY-MRS and calculate and record the average monthly post stripping latex AN and BD level for each NBR type.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S2.d.vii.(1-4).: For the reporting period, post stripping acrylonitrile and butadiene monomer samples were collected for each type of NBR rubber and each day that they were being run. Sample results are being maintained and have been used to calculate average latex post stripping levels for AN and BD for each type NBR rubber on a monthly basis. Refer to Item 19.

36. SECTION C – COMPLIANCE STATUS

S2.e: For Emission Point E-MSC-EMGEN001, the Operator shall maintain records of operating time for each month, calculate and record a 12 consecutive month total hours of operation, and record the monthly fuel consumption of the unit from January 1 through December 31, 2019 and comply with 40 CFR Part 60 Subpart IIII and 40 CFR Part 63 Subpart ZZZZ.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S2.e.: For the applicable reporting period, a record of each months operating time and fuel consumption for the unit has been recorded. A negative declaration has been made for any month that the unit was not operated. A 12 consecutive month total of operations hours has been made. Compliance with 40 CFR Part 60 Subpart IIII and 40 CFR Part 63 Subpart ZZZZ was also achieved through documentation of operating hours and fuel usage. Compliance is continuous.

37. SECTION C – COMPLIANCE STATUS

S3.a.ii.: The Operator shall report a semi-annual compliance report the beginning and ending of the report and identify all periods of exceedance of the average posting stripping residual monomer limits for Emission Points subject to Regulation 6.24

<u>Emission Unit ID</u>	<u>Stack ID</u>	<u>Compliance</u>
E-TKF-100RCU	S-TKF-100CFU	Continuous
E-TKF-100TU	S-TKF-100CFU	Compliance for all
E-TKF-400U	F2	Emission Points
E-PLY-SPT-1	“	
E-PLY-SPT-2	“	
E-PLY-SPT-3	“	
E-PLY-SPT-4	“	
E-PLY-SPT-5	“	
E-PLY-SPT-6	“	
E-PLY-SPT-7	“	
E-PLY-SPT-8	“	

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E-PLY-TK-26	“
E-PLY-MTK-101	“
E-PLY-MTK-102	“
E-PLY-TK-113	“
E-PLY-PLY-1	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-2	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-3	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-4	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-5	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-6	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-7	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-8	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-9	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-10	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-11	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-12	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-13	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-14	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-15	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-16	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-17	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-18	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-19	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-20	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-21	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-22	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-23	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-24	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-25	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-26	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-27	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-28	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-29	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-30	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-31	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-32	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-33	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-34	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-35	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-36	S-PLY-PVJ or S-PLY-MRS
E-PLY-BDTTK-1	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-2	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-3	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-4	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-5	S-PLY-BDTVJ or S-PLY-MRS

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E-PLY-BDTTK-6	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-7	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-8	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-9	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-10	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-11	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-12	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-14	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-15	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-16	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-17	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTTK-18	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-TK-101	S-PLY-TCO
E-PLY-TK-102	S-PLY-TCO
E-PLY-CN101/2/VJ	S-PLY-TCO
E-PLY-BLTTK-13	S-PLY-BLTTK-13/14/15/16
E-PLY-BLTTK-14	S-PLY-BLTTK-13/14/15/16
E-PLY-BLTTK-15	S-PLY-BLTTK-13/14/15/16
E-PLY-BLTTK-16	S-PLY-BLTTK-13/14/15/16
E-PLY-BLTTK-17	S-PLY-BLTTK-17/18/19/20
E-PLY-BLTTK-18	S-PLY-BLTTK-17/18/19/20
E-PLY-BLTTK-19	S-PLY-BLTTK-17/18/19/20
E-PLY-BLTTK-20	S-PLY-BLTTK-17/18/19/20
E-PLY-BLTTK-21	S-PLY-BLTTK-21/22/23/24
E-PLY-BLTTK-22	S-PLY-BLTTK-21/22/23/24
E-PLY-BLTTK-23	S-PLY-BLTTK-21/22/23/24
E-PLY-BLTTK-24	S-PLY-BLTTK-21/22/23/24
E-PLY-BLTTK-25	S-PLY-BLTTK-25/26
E-PLY-BLTTK-26	S-PLY-BLTTK-25/26
E-PLY-BLTTK-27	S-PLY-BLTTK-27/28/29/30
E-PLY-BLTTK-28	S-PLY-BLTTK-27/28/29/30
E-PLY-BLTTK-29	S-PLY-BLTTK-27/28/29/30
E-PLY-BLTTK-30	S-PLY-BLTTK-27/28/29/30
E-PLY-BLTTK-31	S-PLY-BLTTK-31/32/33/34
E-PLY-BLTTK-32	S-PLY-BLTTK-31/32/33/34
E-PLY-BLTTK-33	S-PLY-BLTTK-31/32/33/34
E-PLY-BLTTK-34	S-PLY-BLTTK-31/32/33/34
E-PLY-BLTTK-35	S-PLY-BLTTK-35/36/37
E-PLY-BLTTK-36	S-PLY-BLTTK-35/36/37
E-PLY-BLTTK-37	S-PLY-BLTTK-35/36/37
E-PLY-BLTTK-38	S-PLY-BLTTK-38/39
E-PLY-BLTTK-39	S-PLY-BLTTK-38/39
E-PLY-S/WTk-HL-65	F2
E-PLY-MUTK-HL-191A	F2
E-PCO-TK-4	S-PCO-TK-4/5/7/8/9

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E-PCO-TK-5	S-PCO-TK-4/5/7/8/9
E-PCO-TK-7	S-PCO-TK-4/5/7/8/9
E-PCO-TK-8	S-PCO-TK-4/5/7/8/9
E-PCO-TK-9	S-PCO-TK-4/5/7/8/9
E-PCO-TK-11	Included with E-PCO-CN-1
E-PCO-CN-1	S-PCO-VJT
E-SDR-NBLT	S-SDR-N/SBLT
E-SDR-SBLT	S-SDR-N/SBLT
E-SDR-1BLT	S-SDR-1BLT
E-SDR-2BLT	S-SDR-2BLT
E-SDR-EBLT	S-SDR-EBLT
E-SDR-WBLT	S-SDR-WBLT
E-SDR-1SD	S-SDR-1SD
E-SDR-2SD	S-SDR-2SD
E-SDR-2SDCYC	S-SDR-2SD
E-DRY-FTK-202	F2
E-DRY-FTK-203	F2
E-DRY-FTK-204	F2
E-DRY-NTK-15H	S-DRY-NC/W
E-DRY-NSCR-1	S-DRY-NC/W
E-DRY-NTK-16H	S-DRY-NC/W
E-DRY-NTK-17H	S-DRY-NC/W
E-DRY-NTK-18H	S-DRY-NC/W
E-DRY-NPRS-1	S-DRY-NPRS/NDR1
E-DRY-NGR-1H	S-DRY-NPRS/NDR1
E-DRY-NDR	S-DRY-NPRS/NDR1, S-DRY-NDR2, S-DRY-NDR3
E-DRY-NSCR-2	S-DRY-NC/W

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S3.a.ii.: For the reporting period there were no exceedances of the post stripping residual monomer limits. All required semi-annual compliance reports were submitted, and contain a negative declaration of such exceedances. Compliance was continuous.

38. SECTION C – COMPLIANCE STATUS

S3.a.iii.: For Emission Points subject to Regulation 6.43 the Operator shall report on each semi-annual compliance report the beginning and ending dates of the report, any periods of time when the plants plant wide daily VOC emissions limit was exceeded and amount of such emissions, and corrective actions taken for such exceedance.

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<u>Emission Unit ID</u>	<u>Stack ID</u>	<u>Compliance</u>
E-TKF-100RCU	S-TKF-100CFU	Continuous Compliance for all Emission Points
E-TKF-100TU	S-TKF-100CFU	
E-TKF-TK-101	S-TKF-TK-101	
E-TKF-TK-102	S-TKF-TK-102	
E-TKF-TK-103	S-TKF-TK-103	
E-TKF-TK-104	S-TKF-TK-104	
E-TKF-TK-105	S-TKF-TK-105	
E-TKF-TK-106	S-TKF-TK-106	
E-TKF-TK-107	S-TKF-TK-107	
E-TKF-TK-108	S-TKF-TK-108	
E-TKF-TK-109A	S-TKF-TK-109A	
E-TKF-400U	F2	
E-TKF-TK-401	S-TKF-TK-401	
E-TKF-TK-402	S-TKF-TK-402	
E-TKF-TK-403	S-TKF-TK-403	
E-TKF-TK-404	S-TKF-TK-404	
E-TKF-TK-405	S-TKF-TK-405	
E-TKF-TK-406	S-TKF-TK-406	
E-TKF-TK-407	S-TKF-TK-407	
E-TKF-TK-408	S-TKF-TK-408	
E-TKF-TK-409	S-TKF-TK-409	
E-TKF-TK-410	S-TKF-TK-410	
E-TKF-TK-411	S-TKF-TK-411	
E-TKF-TK-412	S-TKF-TK-412	
E-PLY-MRSSTK	F2	
E-PLY-PAMU	F2	
E-PLY-TK-304	S-PLY-TK-304	
E-PLY-TK-305	S-PLY-TK-305	
E-PLY-TK-306	S-PLY-TK-306	
E-PLY-TK-150	S-PLY-TK-150	
E-PLY-TK-152	S-PLY-TK-152	
E-PLY-SPT-1	F2	
E-PLY-SPT-2	F2	
E-PLY-SPT-3	F2	
E-PLY-SPT-4	F2	
E-PLY-SPT-5	F2	
E-PLY-SPT-6	F2	
E-PLY-SPT-7	F2	
E-PLY-SPT-8	F2	
E-PLY-TK-26	F2	
E-PLY-MTK-101	F2	
E-PLY-MTK-102	F2	
E-PLY-TK-113	F2	

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E-PLY-PLY-1	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-2	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-3	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-4	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-5	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-6	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-7	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-8	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-9	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-10	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-11	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-12	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-13	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-14	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-15	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-16	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-17	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-18	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-19	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-20	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-21	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-22	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-23	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-24	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-25	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-26	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-27	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-28	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-29	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-30	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-31	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-32	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-33	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-34	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-35	S-PLY-PVJ or S-PLY-MRS
E-PLY-PLY-36	S-PLY-PVJ or S-PLY-MRS
E-PLY-BDTK-1	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-2	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-3	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-4	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-5	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-6	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-7	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-8	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-9	S-PLY-BDTVJ or S-PLY-MRS

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E-PLY-BDTK-11	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-12	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-14	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-15	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-16	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-17	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-BDTK-18	S-PLY-BDTVJ or S-PLY-MRS
E-PLY-TO-113	S-PLY-TO-113
E-PLY-TK-101	S-PLY-TCO
E-PLY-TK-102	S-PLY-TCO
E-PLY-PLY-37	S-PLY-TCO
E-PLY-PLY-38	S-PLY-TCO
E-PLY-CN101/2/VJ	S-PLY-TCO
E-PLY-BLTTK-13	S-PLY-BLTTK-14/14/15/16
E-PLY-BLTTK-14	S-PLY-BLTTK-14/14/15/16
E-PLY-BLTTK-15	S-PLY-BLTTK-14/14/15/16
E-PLY-BLTTK-16	S-PLY-BLTTK-13/14/15/16
E-PLY-BLTTK-17	S-PLY-BLTTK-17/18/19/20
E-PLY-BLTTK-18	S-PLY-BLTTK-17/18/19/20
E-PLY-BLTTK-19	S-PLY-BLTTK-17/18/19/20
E-PLY-BLTTK-20	S-PLY-BLTTK-17/18/19/20
E-PLY-BLTTK-21	S-PLY-BLTTK-21/22/23/24
E-PLY-BLTTK-22	S-PLY-BLTTK-21/22/23/24
E-PLY-BLTTK-23	S-PLY-BLTTK-21/22/23/24
E-PLY-BLTTK-24	S-PLY-BLTTK-21/22/23/24
E-PLY-BLTTK-25	S-PLY-BLTTK-25/26
E-PLY-BLTTK-26	S-PLY-BLTTK-25/26
E-PLY-BLTTK-27	S-PLY-BLTTK-27/28/29/30
E-PLY-BLTTK-28	S-PLY-BLTTK-27/28/29/30
E-PLY-BLTTK-29	S-PLY-BLTTK-27/28/29/30
E-PLY-BLTTK-30	S-PLY-BLTTK-27/28/29/30
E-PLY-BLTTK-31	S-PLY-BLTTK-31/32/33/34
E-PLY-BLTTK-32	S-PLY-BLTTK-31/32/33/34
E-PLY-BLTTK-33	S-PLY-BLTTK-31/32/33/34
E-PLY-BLTTK-34	S-PLY-BLTTK-31/32/33/34
E-PLY-BLTTK-35	S-PLY-BLTTK-35/36/37
E-PLY-BLTTK-36	S-PLY-BLTTK-35/36/37
E-PLY-BLTTK-37	S-PLY-BLTTK-35/36/37
E-PLY-BLTTK-38	S-PLY-BLTTK-38/39
E-PLY-BLTTK-39	S-PLY-BLTTK-38/39
E-PLY-TK-14G	F2
E-PLY-TK-15G	F2
E-PLY-TK-16G	F2
E-PLY-S/WTk-HL-65	F2

Title V Annual Compliance Certification

Zeon Chemicals, L.P. (ID #0283)

Attachment A

E-PLY-MUTK-HL-191A	F2
E-PLY-S/WTk-HL-191B	F2
E-PCO-TK-4	S-PCO-TK-4/5/7/8/9
E-PCO-TK-5	S-PCO-TK-4/5/7/8/9
E-PCO-TK-7	S-PCO-TK-4/5/7/8/9
E-PCO-TK-8	S-PCO-TK-4/5/7/8/9
E-PCO-TK-9	S-PCO-TK-4/5/7/8/9
E-PCO-TK-11	Included with E-PCO-CN-1
E-PCO-CN-1	S-PCO-VJT
E-SDR-NBLT	S-SDR-N/SBLT
E-SDR-SBLT	S-SDR-N/SBLT
E-SDR-1BLT	S-SDR-1BLT
E-SDR-2BLT	S-SDR-2BLT
E-SDR-EBLT	S-SDR-EBLT
E-SDR-WBLT	S-SDR-WBLT
E-SDR-1SD	S-SDR-1SD
E-SDR-2SD	S-SDR-2SD
E-SDR-2SDCYC	S-SDR-2SD
E-DRY-CAGTK-103	F2
E-DRY-CAG-TK-106	F2
E-DRY-FTK-202	F2
E-DRY-FTK-203	F2
E-DRY-FTK-204	F2
E-DRY-NTK-15H	S-DRY-NC/W
E-DRY-NSCR-1	S-DRY-NC/W
E-DRY-NTK-16H	S-DRY-NC/W
E-DRY-NTK-17H	S-DRY-NC/W
E-DRY-NSCR-2	S-DRY-NC/W
E-DRY-NTK-18H	S-DRY-NC/W
E-DRY-NPRS-1	S-DRY-NPRS/NDR1
E-DRY-NGR-1H	S-DRY-NPRS/NDR1
E-DRY-NDR	S-DRY-NPRS/NDR1, S-DRY-NDR2, S-DRY-NDR3
E-DRY-PSTK-301	S-DRY-PSBL-300
E-DRY-PSSCR-301A	S-DRY-PSBL-300
E-DRY-PSTK-306	S-DRY-PSBL-300
E-DRY-PSTK-302	S-DRY-PSBL-300
E-DRY-PSSCR-302A	S-DRY-PSBL-300
E-DRY-PSTK-303A	S-DRY-PSBL-300
E-DRY-PSSCR-302B	S-DRY-PSBL-300
E-DRY-PSTK-303B	S-DRY-PSBL-300
E-DRY-PSSCR-303	S-DRY-PSBL-300
E-DRY-PSTK-304	S-DRY-PSBL-300
E-DRY-PSSCR-304	S-DRY-PSBL-300
E-DRY-PSPRS-300	S-DRY-PSBL-300

	S-DRY-PSBL-302
E-DRY-PSDR	S-DRY-PSBL-301
E-PEL-PEL-1	F2
E-PEL-TK-2	F2
E-PEL-SEP-2	S-PEL-SEP-2

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S3.a.iii.: For the reporting period there were no exceedances of the plant wide VOC emissions limits. All required semi-annual reports were filed and contain a negative declaration for such exceedance. Compliance was continuous.

39. SECTION C – COMPLIANCE STATUS

S3.a.iv.(1).(a-g): For Emission Point E-PLY-PLY-38 the Operator shall on each semi-annual compliance report identify the Emission Point, provide the beginning and ending dates for the report, report any times Control Device C-PLY-TCO was not operating and the Emission Point vented uncontrolled, report any time the Control device operated at below the minimum 450°F operating temperature, report any times when the Control device catalyst bed temperature was not monitored continuously, and describe any corrective actions taken in response to any of these events.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S3.a.iv.(1).(a-g): For the reporting period each semi-annual report contained information regarding C-PLY-TCO parameters being monitored, and the information that described compliance status and deviations regarding the TCO operating at a temperature less than 450°F. Compliance is continuous.

40. SECTION C – COMPLIANCE STATUS

S3.a.v.(1-5): For Control Device C-PLY-MRS and the Thermal Catalytic Oxidizer C-PLY-MRV-TO, the Operator shall report on each semi-annual report the Emission Unit ID and Emission Point ID, beginning and ending dates of the report, identification of parameters being monitored, number and types of repairs instituted during the reporting period, and descriptive of any corrective actions.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S3.a.v.(1-5): For the reporting period each semi-annual report contained information regarding parameters being monitored, and information regarding any types of repairs and corrective actions if any were instituted during the reporting period. Compliance is continuous.

41. SECTION C – COMPLIANCE STATUS

S3.b.i.(1-4).: For Control Device S-SDR-1SD, the Operator shall on each semi-annual report any deviations from the requirement to perform a monthly visual inspection, any periods of bypassing the control device while associated Emission Points E-SCR-1SD and E-SCR-SDHPR-1 are in operations, any periods of exceeding the PM emission standards and quantity of excess emissions, and any correct actions taken for each exceedance.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S3.b.i.(1-4).: For the reporting period, the semi-annual report included deviations from the requirement to perform a monthly visual inspection, the Control Device was not bypassed while the associated Emission Points were operated. There were no periods of exceeding the PM emission standards and no excess emissions. Compliance was continuous.

42. SECTION C – COMPLIANCE STATUS

S3.c.i.(1-5).: For these listed Emission Points, the Operator shall report on each semi-annual report the Emission Point and Stack ID, the beginning and ending date of the reporting period, the number of surveys where visible emissions were observed, the date, time and result of any Method 9 that exceeded the opacity standard, and any corrective actions taken.

<u>Emission Unit ID</u>	<u>Stack ID</u>	<u>Compliance</u>
E-SDR-1SD	S-SDR-1SD	Continuous Compliance for all Emission Points
E-SDR-2SD	S-SDR-2SD	
E-SDR-2SDCYC	S-SDR-2SD	
E-SDR-2SDRP	S-SDR-2SD	
E-SDR-2SDHPR-1	S-SDR-SDRHPR-1	
E-SDR-2SDSEP-1	S-SDR-2SDSEP-1	
E-SDR-2SDBPE	S-SDR-2SDSEP-1	
E-SDR-2SDBPW	S-SDR-2SDSEP-1	
E-SDR-1SDHPR-1	S-SDR-1SDHPR-1	
E-SDR-1SDSCR-5	S-SDR-1SDSCR-5	
E-SDR-1SDHPR-4	S-SDR-1SDHPR-4	
E-SDR-1SDPKG	"F"	
E-DRY-NFE-2	S-DRY-NFE-2	
E-DRY-NDR	S-DRY-NPRS/NDR1, S-DRY-NDR2, S-DRY-NDR3	
E-DRY-NCC	S-DRY-NSED-2	
E-DRY-NCP	S-DRY-NCC	
E-DRY-PSDR	S-DRY-PSBL-301	
E-PEL-SEP-1	S-PEL-SEP-1	
E-PEL-SEP-2	S-PEL-SEP-2	

Attachment A

E-PEL-CV-2	S-PEL-FIL-3
E-PEL-SEP-3	S-PEL-FIL-3
E-PEL-SEP-4	S-PEL-FIL-3
E-MSC-EMGEN01	S-MSC-EMGEN01

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S3.c.i.(1-5).: For the reporting period, each semi-annual report included the Emission Point and Stack ID and the beginning and ending dates of the reporting period. There were no visible emissions observed during the reporting period and no Method 9 observations were conducted or corrective actions taken. Negative declarations of these facts were made on each semi-annual report. Compliance was continuous.

43. SECTION C – COMPLIANCE STATUS

S3.d.i-ii.: The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions. If there is a change in a process or process equipment, including a new TAC being emitted or the content of a TAC in a raw material increases above de minimis, the owner or operator shall submit the reevaluated EA Demonstration to the District within 6 months after a change.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S3.d.i-ii.: No changes regarding regulated TACs were made and no change to ongoing environmental acceptability occurred during the reporting period. Operations were within the conditions analyzed for the reporting period and no raw material changes that required re-evaluation of the EA demonstration occurred. Compliance was continuous.

44. SECTION C – COMPLIANCE STATUS

S3d.iii.(1-4): For the Monomer Recovery System (MRS) Vent Control System's Thermal Oxidizer Control Device, C-PLY-MRV-TO, when controlling the MRS vent stream, the Operator shall report the beginning and ending dates of the report period, dates and times the combustion temperature of C-PLY-MRV-TO falls below the minimum allowable, any times the MRS vent stream was discharges to the atmosphere uncontrolled including amount of material discharged, and describe any corrective actions taken. See Item 11 for description of compliance status and deviation regarding the TO operating at a temperature less than 1250°F.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

At the time semi-annual reports were filed, data did not show that the TO was operated below the minimum combustion temperature and so a negative declaration was made on each report. Compliance was continuous.

45. SECTION C – COMPLIANCE STATUS

S3.d.iv.(1-4): For Control Device C-PLY-TCO when operating and controlling the vent stream from C-PLY-MRS, the Operator shall report on each semi-annual report the beginning and ending date of the report, date and times of any operations below the minimum catalyst bed temperature, dates and times of any uncontrolled discharge of the MRS vent to the atmosphere, amounts of uncontrolled materials discharged, and any corrective actions taken.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S3.d.iv.(1-4): For the reporting period C-PLY-TCO was not used to control the MRS vent stream. A negative declaration to this fact was reported in each semi-annual report. Compliance was continuous.

46. SECTION C – COMPLIANCE STATUS

S3.d.v.(1-2): For Control Device C-SDR-2SDRTO controlling Emission Point E-SDR-2SD, including E-SDR-2SDCYC, when latex is being fed to No. 2 Spray Dryer:

Operating scenario 1: While No. 2 Spray Dryer produces Styrene Acrylonitrile (SAN) resin

- (1) The beginning and ending date of the reporting period
- (2) Identify all periods when latex is being fed to No. 2 Spray Dryer, Control Device C-SDR-2SDRTO is controlling the No. 2 Spray Dryer vent stream and the combustion temperature falls below the minimum, including date, start time, and stop time
- (3) Identify all periods the minimum residence time was not met based on the volumetric gas flow rate during the month.
- (4) The monthly and 12-consecutive month period controlled emissions of Acrylonitrile, and the monthly and 12-consecutive month period uncontrolled emissions of Acrylonitrile during emergency shutdown events occurring.
- (5) Identify any emission exceedance for Acrylonitrile.
- (6) Description of any corrective action taken for each exceedance.

Operating scenario 2: While No. 2 Spray Dryer produces NBR

- (1) The beginning and ending date of the reporting period.
- (2) The owner or operator shall identify any emission exceedance for Acrylonitrile and 1,3-Butadiene.
- (3) Description of any corrective action taken for each exceedance.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S3.d.v.(1-2): For the reporting period there were no emergency shut downs of C-SDR-2SDRTO and no uncontrolled TAC emissions to the atmosphere. Each semi-annual report listed the beginning and ending dates of the report period and included negative declarations about operating at a temperature below the minimum and uncontrolled emissions. Monthly and year-to-date controlled acrylonitrile emissions were calculated and reported on semi-annual reports. Compliance is continuous.

47. SECTION C – COMPLIANCE STATUS

S3.d.vi.(1-7): For Emission Points E-PLY-PLY-37 and E-PLY-PLY-38 when bypassing Control Device C-PLY-TCO and venting uncontrolled to the atmosphere, the Operator shall report on each semi-annual report the Emission Unit and Emission Point ID, the beginning and ending dates of the reporting period, dates and times of each bypass event, amount of individual TACs released in bypass and environmental acceptability, reason for bypass, and corrective actions taken. If no bypass events, a negative declaration.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S3.d.vi.(1-7): For the reporting period, there were no events when Control Device C-PLY-TCO was bypassed and TAC emissions were uncontrolled. Each semi-annual report contains a negative declaration to this effect. Compliance is continuous.

48. SECTION C – COMPLIANCE STATUS

S3.d.vii.(1-3): The average monthly post-stripping latex residual monomer levels for NBR Bale, Powder, and Liquid rubbers will be calculated and reported in semi-annual compliance reports. The report shall contain the beginning and ending dates for the reporting period, any periods of exceedance of the average monthly permitted post-stripping latex residual monomer levels, and any corrective actions.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S3.d.vii.(1-3): For the reporting period there were no instances where the average monthly post-stripping latex residual monomer levels exceeded the permitted limits. A negative declaration to this effect is included in each semi-annual report. Compliance is continuous.

49. SECTION C – COMPLIANCE STATUS

S3.e.: For emission Point E-MS-EMGEN001, the Operator shall report in each semi-annual report the Company name, the beginning and ending dates for the reporting period, the calendar month and 12 consecutive month operating hours for the unit, and identification and description of any deviation from permit terms. The Operator shall comply with 40 CFR Part 60 Subpart IIII and 40 CFR Part 63 Subpart ZZZZ.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S3.e.: For the reporting period, the operator has reported on each semi-annual report the beginning and ending dates of the reporting period, the company name, the calendar month and 12 consecutive month operating hours, and a negative declaration that no deviation from permit term for E-MS-EMGEN001 have occurred during the reporting period. Compliance with 40 CFR Part 60 Subpart IIII and 40 CFR Part 63 Subpart ZZZZ was also achieved through documentation of operating hours. Compliance is continuous.

50. SECTION C – COMPLIANCE STATUS

S4.a.-b.: Once during the permit term the Operator shall perform performance tests for PM testing on Control devices C-SDR-1SD and C-SDR-2SD, TAC testing on Control Device C-PLY-MRV-TO and C-PLY-TCO, when controlling MRS vent stream, and TAC testing on Control Device C-SDR-2SDRTO when latex is being run to E-SDR-2SD. The Operator shall conduct all testing with District approved EPA Test methods. A written test protocol shall be submitted to the District. Written Protocol, testing notice, and final report on testing will be submitted to the district in conformance with the time limitations contained in these permit terms. Results of this performance testing will be used to develop emissions factors which will be used to calculate and report emissions.

SECTION D- METHODS USED TO DETERMINE COMPLIANCE

S4.a.-b.: All designated control equipment was tested in December 2017 with the exception of the TCO. The TCO has not been used as a backup to the TO during the permit term. A request to remove the TCO from the performance testing protocol was submitted on December 13, 2017 (this request was approved on December 14, 2017 pending further review). An application (Title V Renewal Application) eliminating the TCO as a backup to the TO was submitted on March 30, 2018.

ZEON CHEMICALS L.P.
2019 ANNUAL COMPLIANCE CERTIFICATION
TITLE V PERMIT NO. 151-97-TV (R8)
Compliance certification period January 1, 2019 thru December 31, 2019

General Conditions Compliance:

1. During the compliance certification period, Zeon Chemicals L.P. complied with all applicable requirements and terms of its Title V Permit with exceptions noted above.
2. During the compliance certification period, Zeon Chemicals L.P. submitted all required annual and semi-annual compliance certifications to the designated authorities on or before the permit-required certification submittal dates.
3. During the compliance certification period, Zeon Chemicals L.P. had no emission units not in compliance, therefore, no schedules for compliance were required to be submitted.
4. During the compliance certification period, Zeon Chemicals L.P. worked with the District on Title V Renewal Application. The Title V Renewal Application was submitted on March 30, 2018.
5. During the compliance certification period, Zeon Chemicals L.P. experienced no emergencies.
6. During the compliance certification period, Zeon Chemicals L.P. per regulation 2.08, Section 2, paid all required emission fees in full on or before the required payment date.
7. During the compliance certification period, Zeon Chemicals L.P. was in compliance with Regulation 2.04 in that there were no construction or modifications to its facility necessitating emission offset.
8. There were no other enforcement actions instituted against Zeon Chemicals L.P. during the compliance certification period
9. During the compliance certification period there were no enforcement actions instituted against Zeon Chemicals L.P. necessitating a defense.
10. During the compliance certification period, Zeon Chemicals L.P. was in compliance with Regulations 5.02 and 5.14 by complying with all NESHAPS applicable to its facility, and maintained a list of all HAPS's used at the facility in its Title V Permit.
11. During the compliance certification period, Zeon Chemicals L.P. has furnished to the District in a reasonable amount of time any information or records requested by the District. A copy of any confidential information submitted to the District has been sent directly to the appropriate USEPA Region.
12. During the compliance certification period, Zeon Chemicals L.P. made no changes to its list of insignificant activities. A list of insignificant activities has been submitted with the Annual Compliance Certification for 2019.

Title V Annual Compliance Certification

Zeon Chemicals, L.P. (ID #0283)

Attachment A

13. During the compliance certification period, Zeon Chemicals L.P. has, in compliance with Regulation 2.16, section 4.3.2, allowed District representatives full access to the facility to perform listed duties.
14. During the compliance certification period, Zeon Chemicals L.P. has performed all monitoring and collected and maintained all required records in compliance with the requirements of this General Condition. All required semi-annual compliance reports have been submitted to the District on or before their required submittal date.
15. During the compliance certification period, Zeon Chemicals L.P. made no changes to any Off Permit Documents.
16. During the compliance certification period, Zeon Chemicals L.P. complied with Regulation 2.16, Section 5.8 in any operational flexibility changes it made to its processes.
17. During the compliance certification period, Zeon Chemicals L.P. complied with any administratively amended changes made to its permit.
18. During the compliance certification period, Zeon Chemicals L.P. made timely and complete permit applications for any significant revision to permit, and for renewal of the Title V Permit.
19. During the compliance certification period, Zeon Chemicals L.P. complied with the 5-year fixed term limit for its Title V Permit.
20. During the compliance certification period, Zeon Chemicals L.P. made a timely and complete application for renewal of its permit in compliance with Regulation 2.16, Sections 4.1.8.2 and 5.13.
21. During the compliance certification period, Zeon Chemicals L.P. made no revisions covered under this General Condition.
22. During the compliance certification period, Zeon Chemicals L.P. had two minor permit revisions.
23. During the compliance certification period, Zeon Chemicals L.P. did not make any significant permit revisions.
24. During the compliance certification period, Zeon Chemicals L.P.'s Title V Permit was neither terminated nor revoked, nor were there any unresolved compliance issues.
25. During the compliance certification period, Zeon Chemicals L.P. operated under the permit shield as specified in Regulation 2.16, Section 4.6.1.
26. During the compliance certification period, Zeon Chemicals L.P. operated its facility in compliance with the requirements of Regulation 2.05 regarding Prevention of Significant Deterioration of air quality.
27. During the compliance certification period, Zeon Chemicals L.P. operated its facility in compliance with the requirements of Regulation 2.16, Section 4.1.13.5.

Title V Annual Compliance Certification

Zeon Chemicals, L.P. (ID #0283)

Attachment A

28. During the compliance certification period, Zeon Chemicals L.P., to the best of its knowledge complied with Regulation 2.07 Section 1 and 2.16 Section 5.1.1.1 and 5.5.4 regarding public participation in permitting procedures.
29. During the compliance certification period, Zeon Chemicals L.P.'s permit was not reopened for cause in conformance with Regulation 2.16, Section 5.9.
30. During the compliance certification period, Zeon Chemicals L.P.'s permit was not reopened for cause by the EPA in conformance with Regulation 2.16, Section 5.10.
31. During the compliance certification period, Zeon Chemicals L.P. had in place a Risk Management Plan 112(r) for each process subject to Section 112(r) of the Act and conformed to 40 CFR Part 68 and Regulation 5.15.
32. During the compliance certification period, Zeon Chemicals L.P. accepted the Severability Clause for permit conditions as specified in Regulation 2.16, Section 4.1.12.
33. During the compliance certification period, Zeon Chemicals L.P. complied with the requirements of Regulation 2.10 regarding stack height considerations. The height of the bypass stack (S-SDR-2SD) is 95 feet before bypass any exhaust emissions (S-SDR-2SD), according with permit condition S1.d.iv.(1-3).
34. During the compliance certification period Zeon Chemicals L.P. complied with requirements of Regulation 1.07.
35. During the compliance certification period, Zeon Chemicals L.P. submitted all required applications, reports, test data, monitoring data, compliance certifications, and any other documents required by the permit to the District address specified in Section a. of this General Condition if required to submit to the EPA, submitted to the address specified in Section b, of this General Condition.
36. During the compliance certification period, Zeon Chemicals L.P. complied with the requirements of the following regulations.

Federally Enforceable Regulations:

1.01	2.03
1.02	2.07
1.03	2.09
1.04	2.10
1.05	2.11
1.06	2.16
1.07	4.01
1.08	4.02
1.09	4.03
1.10	4.07
1.11	6.01
1.14	6.02
2.01	7.01
2.02	

Title V Annual Compliance Certification
Zeon Chemicals, L.P. (ID #0283)
Attachment A

District Only Enforceable Regulations:

1.12	5.20
1.13	5.21
2.08	5.22
5.00	5.23
5.01	

37. During the compliance certification period, Zeon Chemicals L.P. complied with the Stratospheric Ozone Protection Requirements specified in 40 CFR 82, subparts A, B, and F as listed in General Condition 37, Sections a.-g of its Title V Permit.